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Attorneys for Defendants
I-DOCSECURE, LLC,
E-NETSECURE SERVICES, INC.,
ISMART SECURE LLC, INTEGRITY
DATA APPLICATIONS CONSULTING LLC,
JOSEPH BAGGIO and JONATHAN BALZORA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

E-FILED - 7/6/06

ISMART INTERNATIONAL LIMITED,
an India Corporation,

Plaintiff,

vs.

I-DOCSECURE, LLC, a California
Limited Liability company; E-
NETSECURE SERVICES, INC., a
California Corporation; INTEGRITY
DATA APPLICATIONS CONSULTING,
LLC, a California Limited Liability
Company; JOSEPH BAGGIO, and
individual; and JONATHAN BALZORA,
an individual,

Defendants.

CASE NO. C 04-03114 RMW

STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING EXPERT DISCLOSURES AND
DISCOVERY

Judge: Hon. Ronald M. Whyte

1 WHEREAS, the deadline for expert disclosures pursuant to Federal Rule of Civil
2 Procedure 26 is currently set for June 16, 2006;

3 WHEREAS, Plaintiff iSmart International has filed a Motion for Leave to Amend
4 Complaint and for a Request to Issue a New Case Management Scheduling Order (the "Motion"),
5 and the defendants have opposed this Motion in its entirety;

6 WHEREAS, the parties have agreed to set new dates for expert disclosures and discovery
7 pending the ruling on the Motion, which would govern in the event that the Motion was denied;

8 THEREFORE, the parties hereby agree as follows:

- 9
- 10 1. The deadline for initial expert disclosures shall be July 17, 2006.
 - 11 2. The deadline for rebuttal expert disclosures shall be August 7, 2006.
 - 12 3. The deadline for completion of expert discovery shall be August 25, 2006.
 - 13 4. In the event that the pending Motion is granted, the parties agree to meet and
14 confer further to determine the extent to which these dates should be modified.
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17 DATED: June 13, 2006

MICHAEL N. EDELMAN
PAUL, HASTINGS, JANOFSKY & WALKER LLP

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20 By: 

MICHAEL N. EDELMAN

21 Attorneys for Defendants
22 I-DOCSECURE, LLC, E-NETSECURE SERVICES,
23 INC., ISMART SECURE LLC, and JOSEPH BAGGIO
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1 DATED: June 12, 2006

JOSEPH KOURI
SEDGWICK, DETERT, MORAN & ARNOLD LLP

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3
4 By: 

JOSEPH KOURI

Attorneys for Plaintiff and Counterdefendant
iSMART INTERNATIONAL LIMITED and
Counterdefendant RAJ DHESIKAN

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7
8 DATED: June __, 2006

JAMES A. HUGHES
SULLWOLD & HUGHES

9
10 By: 

JAMES A. HUGHES

Attorneys for Defendants INTEGRITY DATA
APPLICATIONS CONSULTING, LLC, and
JONATHAN BALZORA

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15 IT IS SO ORDERED.

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17 Dated: 7/6, 2006

18 By: /s/ Ronald M. Whyte
Hon. Ronald M. Whyte
United States District Court Judge